

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

Re: Docket Nos. 760, 868, 889 & 930

**CERTIFICATION OF COUNSEL REGARDING AMENDED FIRST
NOTICE OF ASSUMPTION AND ASSIGNMENT OF CERTAIN
EXECUTORY CONTRACTS AND/OR UNEXPIRED LEASES**

The undersigned counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On April 28, 2025, the Debtors filed the *First Notice of Assumption and Assignment of Certain Executory Contract and/or Unexpired Leases* [Docket No. 760] (the “First Assumption Notice”) regarding the assumption and assignment of the unexpired leases set forth on Schedule 2 to the First Assumption Notice (the “Original Assumption List”).

2. On May 16, 2025, the Debtors filed the *Amended First Notice of Assumption and Assignment of Certain Executory Contracts and/or Unexpired Leases* [Docket No. 930] (the “Amended First Assumption Notice”). Attached as Schedule 2 to the Amended First Assumption Notice was a revised schedule of unexpired leases (the “Revised Assumption List”). Attached as Schedule 3 to the Amended First Assumption Notice was a proposed form of order (the

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

“Assumption Order”) authorizing the assumption and assignment of the unexpired leases on the Revised Assumption List.

3. The deadline to object to the Amended First Assumption Notice was May 30, 2025 (the “Objection Deadline”).

4. On May 15, 2025, the landlord of Store No. 2132 (the “Avondale Landlord”) filed the *Limited Objection of Alameda Crossing Station LLC to First Notice of Assumption and Assignment of Certain Executory Contract and/or Unexpired Leases* [Docket No. 889] (the “Avondale Objection”).

5. On May 15, 2025, the landlord of Store No. 2226 (the “Katy Landlord”, together with the Avondale Landlord, the “Landlords”) filed the *Objection of IGI21 Katy LLC to First Notice of Assumption and Assignment of Certain Executory Contract and/or Unexpired Leases* [Docket No. 868] (the “Katy Objection”, together with the Avondale Objection, the “Objections”).

6. Attached as **Exhibit A** is a revised Assumption Order (the “Revised Assumption Order”), which the Landlords have confirmed resolves the Objections.

7. Any unresolved objections and informal comments received regarding the remaining balance of the leases included in the Amended First Assumption Notice (collectively, the “Outstanding Leases”) are not included in the Revised Assumption Order. For the avoidance of doubt, the Amended First Assumption Notice remains pending, and has not been withdrawn, with respect to the Outstanding Leases. To the extent that the Debtors and the objecting landlords reach agreement with respect to any Outstanding Lease, the Debtors will submit a proposed form of order with respect to such lease.

8. Accordingly, the Debtors request entry of the Revised Proposed Order attached hereto as **Exhibit A** at the Court’s earliest convenience.

Dated: June 20, 2025
Wilmington, Delaware

/s/ Jack M. Dougherty

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